

Hearing Date and Time: April 8, 2015 at 10:00 a.m. (Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	Case No. 08–13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**JOINDER OF THE OCH-ZIFF RESPONDENTS TO (I) THE OBJECTION
OF CITADEL ENERGY INVESTMENTS LTD. AND CITADEL EQUITY
FUND LTD. TO THE MOTION TO ALLOW DISCLOSURE OF THE
DERIVATIVE QUESTIONNAIRES PURSUANT TO SECTION 107(a) OF
THE BANKRUPTCY CODE AND (II) THE OBJECTION OF
DERIVATIVE QUESTIONNAIRE RESPONDENTS TO MOTION TO
ALLOW DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES
PURSUANT TO SECTION 107(a) OF THE BANKRUPTCY CODE**

Och-Ziff Capital Structure Arbitrage Master Fund, Ltd., OZ Asia Master Fund, Ltd., OZ
Europe Master Fund, Ltd., OZ Global Special Investments Master Fund, LP and OZ Master
Fund, Ltd. (collectively, the “**Och-Ziff Respondents**”) hereby join in (i) the Objection of Citadel
Energy Investments Ltd. and Citadel Equity Master Fund Ltd. to the Motion to Allow Disclosure
of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code filed on

March 30, 2015 [Docket No. 49030] and (ii) the Objection of Derivative Questionnaire Respondents to Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code filed on March 30, 2015 [Docket No. 49040] (collectively, the “**Objections**” and the parties filing the Objections, the “**Objecting Parties**”). In support of this joinder (this “**Joinder**”), the Och-Ziff Respondents respectfully submit as follows:

1. The Och-Ziff Respondents and certain of the above-captioned debtors (the “**Debtors**”) were parties to derivatives contracts.
2. The Och-Ziff Respondents are listed on Exhibit A to the Debtors’ Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code [Docket No. 48939] (the “**Motion**”) and upon information and belief, the Debtors intend to disclose the Och-Ziff Respondents’ confidential information to third-parties.
3. The Och-Ziff Respondents, like the Objecting Parties, relied on the protections provided by the Bar Date Order (as defined in the Motion), in submitting their derivatives questionnaires. Accordingly, for the reasons set forth in the Objections, the Och-Ziff Respondents object to the relief requested in the Motion.
4. The Och-Ziff Respondents reserve their rights to amend or supplement this Joinder and to incorporate other objections to the Motion filed by other parties in interest in a subsequent joinder filed with the Court or at the hearing to consider the Motion.

WHEREFORE, the Och-Ziff Respondents hereby join in the relief sought in the Objections and respectfully request that the Court (i) deny the Motion or, alternatively, direct the Debtors to redact all identifying, confidential and proprietary information from any documents disclosed to third-parties or otherwise provide protections for the sensitive commercial information contained in the derivative questionnaires and (ii) grant further relief as the Court

deems just and proper.

Dated: New York, New York
April 1, 2015

SHEARMAN & STERLING LLP

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